



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

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October 30, 2001

Michael Christie, P.G.
Vice President
Penn E&R
2755 Bergey Road
Hatfield, PA 19440

Dear Mr. Christie:

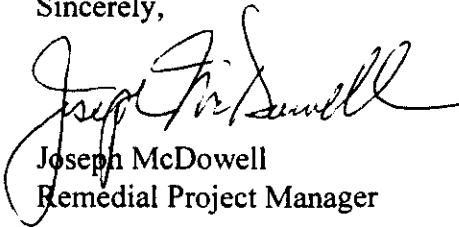
This letter is in reference to the *Analytical Results for the Post-Excavation Soil Samples Collected from the Cinder/Slag Fill Area Located on Liberty Property Trust's 2301 Renaissance Boulevard Property*, submitted to EPA by Penn E&R on October 25, 2001 for the Crater Resources Site ("Site"). The submittal was prepared by Penn Environmental and Remediation (Penn E&R) on behalf of Liberty Property Limited Partnership and Liberty Property Trust (collectively LPT) pursuant to the Unilateral Administrative Order for the Crater Resources Superfund Site. The selected remedy for the Cinder Slag Fill Area (CSFA) is removal for contaminated materials and soils.

EPA has conducted a preliminary review of the Cinder Slag Fill Area (CSFA) data. Because the data have not yet been validated, EPA has not reviewed this report in detail. The following comments are provided:

1. The report appears to compare both maximum concentrations and upper confidence limits (UCLs) to risk-based concentrations (RBCs) and soil screening levels (SSLs). The maximum concentration should be used for screening comparisons; the UCL should be used during detailed risk assessments that take all exposure routes into account.
2. Table 2 was resubmitted with RBCs at Hazard Quotients (HQs) of 0.1, but the same target HQ should apply to noncarcinogenic SSLs.
3. A dilution-attenuation factor (DAF) of 20 should not be used for the SSLs. The site-specific DAF of 6.4 should be used.
4. The background comparison should not just show the range, if it is being used to draw conclusions about whether the site concentrations exceed background. For that determination, a combination of an upper tolerance limit and a hypothesis tests of means (such as the Mann-Whitney or student t tests) is recommended. Also, the information concerning background concentrations has not been accepted by EPA, but was provided for your use in evaluating background concentrations.

Please contact me at (215) 814-3192 should you have any questions or comments on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph McDowell". The signature is fluid and cursive, with the first name "Joseph" and last name "McDowell" clearly distinguishable.

Joseph McDowell
Remedial Project Manager

cc: A. Duchovnay (EPA)
D. Minsker (PADEP)
B Hartlein (Liberty)
J. Bartlett (EAC)
J. Shelton (Malcom Pirnie)
T. Legel (AGC)